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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

United States of America,

Plaintiff,

v.

PCPLV LLC d/b/a Pinnacle Compounding  
Pharmacy, Ofir Ventura, Cecelia Ventura,  
Brandon Jimenez, Robert Gomez, Gomez &  
Associates, Inc., Rock'n Rob Enterprises,  
Amir Shalev, D.P.M., AS Enterprises, Inc.,  
and Ivan Lee Goldsmith, M.D.,

Defendants.

Case No. 2:21-cv-00184-JCM-DJA

**Stipulation to Extend the Deadlines for  
the Rule 26(f) Conference, Discovery  
Plan, and Scheduling Order**

**(First Request)**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 the United States requests, and Defendant Ivan Lee Goldsmith, M.D., does not oppose, 30-day extensions of the due dates to hold a Rule 26(f) conference and submit a proposed discovery plan and scheduling order. Dr. Goldsmith filed his answer on December 28, 2023. The provisions of Fed. R. Civ. P. Rule 6(a)(1)(C) and Local Rule 26-1 result in due dates of January 29, 2024, and February 12, 2024, for the Rule 26(f) conference and the filing of a proposed discovery plan and scheduling order, respectively. This requested extension would move such due dates to February 26, 2024, and March 12, 2024, respectively. To calculate the new due dates, each of the initial due dates—both of which fall on a Saturday—have not been adjusted to fall on the Monday immediately following the due date. This is the first request for such an extension.

1 Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to  
 2 request additional time to perform an act. Further, the committee notes to the 2015  
 3 amendment to Federal Rule of Civil Procedure 16 recognize that in some cases, “the  
 4 parties cannot prepare adequately for a meaningful Rule 26(f) conference and then a  
 5 scheduling conference in the time allowed.” The committee noted that “[l]itigation  
 6 involving . . . multiple parties . . . may be more likely to need extra time to establish  
 7 meaningful collaboration between counsel and the people who can supply the information  
 8 needed to participate [at a Rule 26(f) conference] in a useful way.”

9 Although Dr. Goldsmith has filed his answer, the other defendants in this case  
 10 presently are at various stages of service of process and entering an appearance. Defendant  
 11 Amir Shalev, D.P.M., currently has a due date of January 26, 2024, for filing his answer.  
 12 Defendants Ofir Ventura, Cecelia Ventura, and Brandon Jimenez currently have due dates  
 13 that fall in February 2024 for filing their respective answers. The United States was only  
 14 recently—on January 23, 2024—able to serve Defendant Robert Gomez, and he has yet to  
 15 enter an appearance in this case.

16 The United States thus respectfully requests this extension to allow the parties  
 17 sufficient time to enter their appearances, meaningfully participate in a Rule 26(f)  
 18 conference, and collaborate to file a proposed discovery plan and scheduling order.

19 Respectfully submitted this 29th day of January 2024.

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21 /s/ E. Brent Bryson, Esq.

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/s/ Summer A. Johnson

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**ORDER**

DATED: 1/30/2024

IT IS SO ORDERED:

  
 HONORABLE DANIEL ALBREGTS

UNITED STATES MAGISTRATE JUDGE